

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: :
Sean M Bing : Case No.: 5:22-bk-00772-MJC
Debtor(s) : Chapter 13
: Judge Mark J. Conway
: * * * * * * * * * * * * * * * * * * * * * * *
Nationstar Mortgage LLC :
Movant :
: v.
: Sean M Bing :
: David E Dixson :
: Jack N Zaharopoulos, Trustee :
Respondents :
:

**OBJECTION OF NATIONSTAR MORTGAGE LLC TO CONFIRMATION OF THE
PLAN (DOCKET NUMBER 19)**

Nationstar Mortgage LLC ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Sean M Bing ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 699 Tinkers Creek Lane, Columbus, OH 43207 ("Property").
2. Debtor's Plan fails to provide for Creditor's secured claim. Upon information and belief, Debtor holds an interest in the Property.
3. As a result, Debtor's Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to provide for a secured claim.
4. Creditor requests that Debtor amend the Plan to either provide for Creditor's claim or to surrender their interest in the Property.

22-019560_JDD1

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Alyk L. Oflazian

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Attorneys for Creditor
The case attorney for this file is Alyk L. Oflazian.
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| | : | |
| | : | |
| Sean M Bing | : | |
| David E Dixson | : | |
| Jack N Zaharopoulos, Trustee | : | |
| Respondents | : | |

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of Nationstar Mortgage LLC to the Confirmation of the Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Jack N Zaharopoulos, Chapter 13 Trustee, info@pAMD13trustee.com

Michael I. Assad, Attorney for Sean M Bing, mail@cibiklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S.

Mail to the following:

Sean M Bing, 149 Bon Sher Drive, Tannersville, PA 18372

/s/ Alyk L. Oflazian

22-019560 JDD1